

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

COURTNEY BARNES,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 2:19-cv-1271-GMB
)	
JAM FOOD COMPANY, INC.)	
D/B/A FULL MOON BAR-B-QUE,)	
)	
Defendant.)	

MOTION TO WITHDRAW

COMES NOW, the undersigned counsel, Joshua A. Wradly and Courtney B. Crampton (hereinafter referred to collectively as the “undersigned”), and respectfully request that this Court grant this Motion to Withdraw as Plaintiff’s counsel in the above-styled matter. In support of said Motion, the undersigned hereby show as follows:

1. The undersigned’s firm has procedures in place to ensure its clients are not in active bankruptcy.
2. During the undersigned’s initial intake with Plaintiff, on or about October 9, 2018, Plaintiff represented that she was not in active bankruptcy.
3. At the time the undersigned’s firm took on representation of Plaintiff, on or about October 25, 2018, Plaintiff was not in active bankruptcy.

4. Pursuant to Plaintiff's contract with the undersigned, signed on October 25, 2018, Plaintiff is to inform the undersigned if she intends to file for bankruptcy.

5. Prior to filing the Complaint (Doc. 1), the undersigned confirmed that Plaintiff was not in active bankruptcy.

6. Recently, the undersigned discovered that Plaintiff filed a Chapter 7 Voluntary Petition in the United States Bankruptcy Court for the Northern District of Alabama on September 13, 2019, without informing the undersigned.

7. If the undersigned had been aware that Plaintiff intended to file for bankruptcy, the undersigned would have made the decision not to file a Complaint on behalf of Plaintiff.

8. On October 30, 2019, Plaintiff was contacted and advised that, for the aforementioned reasons, the undersigned would be filing a Motion to Withdraw as Plaintiff's counsel.

9. Plaintiff is being served with a copy of the undersigned's Motion to Withdraw by electronic and U.S. First Class mail.

10. Plaintiff was informed of her right to file an objection with the Court within fourteen (14) days of the date of the notification.

11. Plaintiff's claims will not be prejudiced by the undersigned's withdrawal from this matter.

Respectfully submitted,

s/ Joshua A. Wrady

Joshua A. Wrady (ASB-9617-J68W)

Courtney B. Crampton (ASB-3685-J61X)

Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon the following via electronic mail, U.S. First Class Mail, and/or with the Clerk of the Court using the CM/ECF system on this the 9th day of December 2019.

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s/ Joshua A. Wrady

Attorney for Plaintiff